
GRANT MILITARY ASSISTANCE GUIDE

INTERNATIONAL MILITARY EDUCATION AND TRAINING (IMET)

*U.S. Department of State
Bureau of Political-Military Affairs
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I. INTRODUCTION TO INTERNATIONAL MILITARY EDUCATION AND TRAINING (IMET)

IMET is a Department of State's (State) program, generally implemented by Department of Defense (DoD), authorized to provide military education and training to military and select civilian foreign partner students as determined by the Secretary of State.

IMET-funded courses and training events expose partner nation defense establishment personnel to U.S. military training, doctrine, and values, and are intended to build lasting military-to-military relationships. Most IMET-funded activities are conducted at U.S. military institutions in the United States, allowing for valuable cultural exchanges with communities across the country while students attend courses.

LEGAL AUTHORITY FOR IMET ACCOUNT

Section 541 of the Foreign Assistance Act of 1961 (FAA) authorizes the provision of military education and training to military and related civilian personnel of foreign countries. Section 543 of the FAA states that IMET programs shall be designed to:

- 1) Encourage effective and mutually beneficial relations, and increased understanding between the United States and foreign countries in furtherance of the goals of international peace and security;
- 2) Improve the ability of participating countries to use their resources, including defense articles and defense services obtained by them from the United States, with maximum effectiveness, thereby contributing to greater self-reliance by such countries; and
- 3) Increase the awareness of nationals of foreign countries participating in such activities of basic issues involving internationally-recognized human rights.

EXPANDED-IMET (E-IMET)

A special category of training and education within the IMET authority is known as Expanded IMET (E-IMET). Consistent with section 541 of the FAA, these courses: 1) contribute to responsible defense resource management; 2) foster greater respect for and understanding of the principle of civilian control of the military; 3) contribute to cooperation between military and law enforcement personnel with respect to counter-narcotics law enforcement efforts; or, 4) improve military justice systems and procedures in accordance with internationally recognized human rights. Courses that fulfill these purposes are categorized as E-IMET, based on a determination on curriculum-content by the Defense Security Cooperation Agency (DSCA).

When countries are legally restricted to E-IMET assistance only, State considers English language training and support, such as language labs, to be E-IMET. Military and related civilian personnel from countries whose IMET programs are restricted by law to E-IMET only may: (a) participate in stand-alone English language training, (b) receive English language support through the IMET program, or (c) participate in preparatory English language training associated with other E-IMET courses. None of this assistance counts towards the 10% or 20% E-IMET policy requirements (see section IV).

II. ROLES AND RESPONSIBILITIES

Department of State: State provides oversight, management, and policy guidance for the IMET authority and account, ensuring funding execution is in alignment with U.S. foreign policy objectives and applicable legal requirements. The Bureau of Political Military Affairs (PM) Office of Security Assistance (SA) is responsible for the global management and direction of IMET and is the program's primary steward. PM/SA performs the day-to-day management of the IMET account for State, including confirming programs' alignment with policy and legal requirements; monitoring program execution to ensure alignment with evolving political and security circumstances and funding availability; recommending budget request levels to State's Office of U.S. Foreign Assistance Resources (F); justifying program requests and execution to the White House Office of Management and Budget (OMB) and Congress; and processing funding releases from F, notifications to Congress (as needed), and funding releases to DSCA. PM/SA also develops policy guidance, in coordination with other stakeholders to support the DoD training community in implementing the IMET program and to provide parameters for its execution in certain circumstances. PM/SA issues global guidance on the use of IMET, such as that included in this document. PM/SA also issues annual policy guidance to each Combatant Command (CCMD), prior to the annual Security Cooperation Education and Training Working Group (SCETWG), to assist Security Cooperation Officers (SCOs) in developing their IMET program and in understanding the legal and policy restrictions that affect their countries' IMET funding.

Political Officers (POLOFF): POLOFFs are the diplomatic face of the United States and advance our foreign policy objectives along with the rest of the country team. POLOFFs, while not involved in the execution of the IMET program, should be consulted on a regular basis and be provided with updates on significant developments. In addition, POLOFFs should coordinate the inclusion of civilian government and non-government attendance in the appropriate IMET funded courses that will strengthen the relationship with the United States. and among the partner nation agencies.

Security Cooperation Officers (SCOs): SCOs are responsible for the development and implementation of IMET programs at Post. As such, SCOs should develop a strategic IMET program, in alignment with the objectives of the Integrated Country Strategy and in consultation with the partner nation. SCOs generally have broad discretion in the implementation of the IMET program in country, within the bounds of applicable legal requirements and policy parameters established by State. SCOs should therefore have a basic understanding of the U.S. courses available that will further U.S. foreign policy and security interests in their respective country. Additionally, SCOs may deny candidates recommended by the partner nation for training if the student is not qualified or if they suspect IMET is being abused by the partner nation as a reward, pay off, or to support cronyism or nepotism. SCOs are responsible for ensuring that all IMET candidates are Leahy vetted and that students have paperwork demonstrating appropriate medical screening prior to traveling to the United States. SCOs are also responsible for keeping their country Standardized Training Lists (STLs) up to date to reflect actual training requirements so that each Military Department is funded accordingly. SCOs are responsible for tracking graduates of the IMET program as much as possible; at a minimum, SCOs should track the career progression of graduates from mid and senior level professional military education (PME) courses (e.g. Staff Colleges and War Colleges). Finally, SCOs are required to record in the Security Assistance Network/Training Management System (SAN/TMS) all military training provided to foreign military personnel for Congressional reporting requirements.

Defense Security Cooperation Agency (DSCA): DSCA (Strategy Directorate) provides IMET program implementation policy through the Security Assistance Management Manual (SAMM) to the CCMD, military departments (MILDEPs), and SCOs. Based on State guidance and country allocations, DSCA (Business Operations Directorate) manages and issues the IMET funds to the MILDEPs, which further disburse the funds to support specific country program and/or courses at the individual

schoolhouses. DSCA also consolidates data regarding all military training provided to foreign military personnel and provides it to State to support Congressional reporting requirements.

U.S. Military Departments (MILDEPs): The MILDEPs execute U.S. military education and training conducted under IMET and other U.S. programs. This education and training is conducted either within the continental United States, primarily at military training facilities, or outside the continental United States by mobile education or training teams and at selected U.S. facilities overseas. The MILDEPs utilize the Joint Security Cooperation Education and training (JSCET) regulation to integrate prescribed policies, responsibilities, procedures, and administration for the education and training of international military students by States of the Army, the Navy, and the Air Force.

Combatant Commands (CCMDs): The CCMDs ensure the execution of IMET program within their command complies with all applicable legal and policy guidance and furthers DoD national security goals and objectives.

Schoolhouses: The schoolhouses are the implementing agents for the development, implementation, and execution of IMET and other international training programs.

III. ELIGIBLE PARTICIPANTS

Section 541 of the FAA authorizes the provision of military education and training to military and related civilian personnel of foreign countries. IMET eligibility varies based on a candidate's organization and role:

Military Personnel under the Ministry of Defense (MOD): As a general matter, section 541 authorizes IMET to train military personnel. Any uniformed military personnel under the MOD are eligible to attend all IMET funded courses. However, certain categories of MOD personnel are subject to specific considerations and/or restrictions as noted below:

- Consistent with section 660 of the FAA, IMET may not be used to support any police, internal intelligence or surveillance function for any recipient. Accordingly, members of units engaged in such activities are not eligible to receive IMET.
- Military Police (MP) units are eligible for IMET. The United States must ensure, however, that the skills learned in MP training programs are applied as part of the student's military function, rather than a civilian law enforcement function. As such, SCOs must certify that an individual attending MP training: 1) does not currently conduct civilian law enforcement functions; and 2) will not be transferred to a unit conducting civilian law enforcement activities for a period of two years following return from U.S. funded IMET training. The certification, including course title, (Military Articles and Services List number (MASL), and host nation service name, function, and role, should be signed by the recipient government and submitted to PM/SA, DSCA, and the Implementing Agency for approval prior to sending the student to training. Failure to request approval may result in last minute training cancellations and loss of IMET funding.
- Gendarmeries that may fall under the MOD are a special category which is not generally eligible for IMET. See below for further information.
- As a matter of policy, MOD civilian personnel are only eligible for E-IMET.

Civilian Personnel: Civilian personnel, including civilian MOD personnel, foreign government personnel of ministries other than the MOD, legislators, and non-government civilians, are eligible to participate only in E-IMET courses. Such personnel may only attend E-IMET courses that would directly advance the goals of E-IMET (see section I – E-IMET), accounting for the candidate’s current and expected position in the security sector.

Non-MOD Security Forces: IMET may support non-MOD security forces only with the approval of PM/SA. Non-MOD entities approved by PM for IMET funding will remain eligible for IMET funding unless PM issues a revised determination based on changed circumstances. Eligibility determinations take into account the following factors:

- **Foreign coast guards** are eligible for IMET even if they fall outside the MOD.
- As a general matter, **police, prison enforcement forces, other law enforcement forces, or any internal intelligence or surveillance organizations** are NOT eligible for IMET, consistent with section 660 of the FAA. However, PM/SA may approve, on a case-by-case basis, IMET for security forces in countries with a longstanding democratic tradition, no standing armed forces, and without a consistent pattern of gross violations of internationally recognized human rights. If SCOs believe these conditions exist in a particular country, they must first secure PM/SA approval prior to providing IMET on that basis. *Examples of recipients that have received approval on a case-by-case basis include: Costa Rica Air Vigilance Service; Kiribati Police Services; Mauritius Police; Nauru Police Force; Panamanian National Police (PNP) Tactical Antidrug Operations Unit (UTOA), Counterterrorism Special Forces Unit (UFEC), and Tactical Explosive Unit (UTE); Panama Institutional Protection Service (SPI) Special Anti-Terror Group (GEAT); Samoa Police Force and Maritime Police Wing; and Tuvalu Police Services.*
- **Gendarmes**, regardless of whether they fall under the MOD or Ministry of Interior (MOI), generally perform a civilian law enforcement function on a national level. As such, these units are not eligible to receive IMET, per the restriction in section 660. To the extent that the unit does not perform a civilian law enforcement function, SCOs must contact PM/SA for approval prior to providing IMET to gendarmes.

Other non-MOD forces. If SCOs believe that members of a non-MOD security force are considered “military personnel” and should be eligible for IMET, SCOs must first receive prior approval from PM/SA, in consultation with State’s Office of the Legal Adviser (L). To seek approval, SCOs must provide PM/SA with a policy justification for the proposed training and a description of the force’s mission and command structure, including whether the force reports to the central government and through what agency or mechanism so that State can consider whether it is legally appropriate to provide IMET to that unit. State will not provide IMET to security forces with a civilian law enforcement function.

Criteria for Approval of IMET for Non-MOD Recipients: To consider IMET for with non-MOD units, PM, in consultation with the Office of the Legal Advisor (L), will examine the mission of the entity for which the course is requested, and the relationship between that entity and other security forces with police functions, to ensure that the provision of assistance would be consistent with the purpose of the FAA and U.S. foreign policy. Considerations include:

- The full scope of the recipient unit’s mission and that of the agency to which it reports, with particular attention to whether such mission is related to legitimate self-defense or also includes civilian law enforcement tasks, for example functions related to the investigation of common crimes or crowd control. (Note: Narcotics trafficking is generally considered a law enforcement

task unless the trafficking takes place on such a scale as to present a threat to national internal security, such as where criminal networks control territory in the country.)

- Whether there is a high risk that the individual trained may be transferred to another unit or agency with law enforcement functions or a mission that does not align with U.S. foreign policy objectives.
- Whether the unit might be employed in a manner inconsistent with U.S. principles, such as to stage a coup or repress the population. Note: PM is particularly cautious about providing assistance to non-MOD military or paramilitary forces that answer directly to a political leader rather than to a government ministry.
- Whether the funds would be better spent on a MOD unit.

IV. IMET PROGRAM CONTENT POLICY GUIDANCE

The primary purposes of the IMET program, consistent with section 543 of the FAA, are to encourage effective and mutually beneficial relations; improve the ability of participating countries to use their resources, including defense articles and defense services obtained by them from the United States, with maximum effectiveness; and increase foreign countries' awareness of basic issues involving internationally-recognized human rights. To fulfill these purposes, the following general policy guidance applies to the planning and development of a country's IMET program:

For FY21, to address the Department's greater focus on PME, we have developed an updated framework to increase the number of students attending these courses that countries will be required to follow:

Country Allocation	Guidelines ¹
Less than \$500,000	50 percent PME
Between \$500,000 and \$1,000,000	60 percent PME
Greater than \$1,000,000	70 percent PME

- At least 10 percent of the IMET allocation must fund E-IMET courses. Twenty percent will be required for countries identified annually by State as having a problematic human rights history involving the military.
- No more than 25 percent of the IMET allocation may support technical/operational training (e.g. boat maintenance, Ranger training). As a general matter, IMET should not fund high-cost technical training (e.g. pilot training). *Such operational capacity building training is more appropriately provided under Foreign Military Financing (FMF), Foreign Military Sales (FMS), or another authority.*

More specific regional and country guidance is provided by PM/SA to the CCMDs and the DoD training community prior to the annual SCETWG.

E-IMET REQUIREMENTS

E-IMET is a subset of courses within the IMET program specifically designed to have a targeted focus on educating partner countries in the management of their defense resources; improving their systems of military justice in accordance with internationally recognized human rights; and fostering a greater

¹ This percentage is inclusive of any requisite English language training.

respect for, and understanding of, the principle of civilian control of the military. **At least 10 percent of all IMET recipient countries' IMET allocation MUST fund E-IMET courses.** In addition to members of the military, civilian members of other agencies, individuals who are not members of the government may attend E-IMET courses. SCOs should consult with their Pol-Mil officers at post as well as their PM/SA counterpart prior to scheduling non-governmental students.

State requires countries identified as having a problematic human rights history involving the military to use at least 20 percent of the country's IMET allocation on E-IMET courses. Half of the E-IMET required percentage for these countries must emphasize concepts such as respect for human rights, rule of law, and civilian control of the military. For example, if a country is required to have 20 percent of the IMET allocation dedicated to E-IMET courses, no less than 10 percent of their overall allocation must support courses emphasizing concepts such as respect for human rights, etc., and the remaining 10 percent of the allocation E-IMET requirement may support other E-IMET courses. PM/SA will identify countries that are subject to this heightened requirement prior to the annual CCMD SCETWG. English language training and support does not count towards these minimum E-IMET requirements.

INAPPROPRIATE TRAINING COURSES

IMET must fund courses that support the development of security capacity in the interest of the U.S. and or partners', further military professionalization, and build on concepts included in E-IMET. As such, courses, such as musician and food specialist courses, are considered inappropriate for IMET and should not be included in a SCO's IMET program.

REPETITIVE COURSES

Country IMET programs should be diverse enough to spread U.S. training, doctrine, and values throughout the recipient's defense establishment. As such, SCOs should **not include more than five of the same technical course and no more than ten of the same PME course** in their IMET program per fiscal year. For SCOs wishing to exceed these limits, they must provide a written justification prior to the SCETWGs to the CCMD. The CCMD will submit a request to DSCA to coordinate approval with PM/SA on a case-by-case basis.

MASTER'S DEGREE COURSES

Developing advanced skills that further the security capacity of a country is possible with IMET, to a limited degree, through master's degree programs. However, these courses often come at significant expense, taking up a large proportion of a country's annual funding allocation. Further, there is a risk that students may leave the military after receiving the degree that is more technical in nature.

To address these issues, the following policy is in place regarding IMET funding for master's degrees:

- IMET may fund no more than two non – PME/E-IMET master's degree courses per year and at a cost of no more than 10 percent of a country's annual IMET allocation. On a case-by-case basis, PM/SA may waive the number or allocation percentage.

SCOs are required to submit written justification for non – PME or non-E-IMET, **prior** to the SCETWGs, to the CCMD. The CCMD will submit a request to DSCA to coordinate approval with PM/SA. Lack of prior justification will reduce the likelihood of the course being approved. The justification should include:

- The course title and description;
- Why the course is requested/selected;
- What benefit it serves the United States, and how the course fits into the overall U.S. security assistance objectives in your country;
- Whether a candidate has been identified for the course; and
- How the degree will be implemented upon the student's return, including what position the student is expected to encounter upon his/her return.

In some cases, State and DSCA may condition approval after receiving a signed commitment from the student and the recipient government that the student will serve in a position that directly benefits from the master's degree for a certain time period. Failure to request approval from PM/SA may result in last minute training cancellations. PM/SA encourages SCOs to identify appropriate candidates early for master's degree programs to ensure competency, work ethic, and implementation of such education upon return to the student's home country.

HEALTH-RELATED COURSES

IMET should generally not be used to fund advanced medical training, such as doctor or pharmacist training, given the indirect connection to IMET purposes, the expense of such courses, and the heightened risk for graduates' departure to the private sector. While such courses are discouraged with IMET, SCOs may seek an exception, with justification, from PM/SA prior to the SCETWG. IMET may be used to support courses, such as combat medical, military-related medical leadership management courses, and in cases where approved, physical therapy courses.

ORIENTATION TOURS

Orientation tours are limited to new country programs unless justified by extraordinary circumstances. The IMET program may fund orientation tours only if the CCMD and DSCA (BPC/ICB), in coordination with PM/SA, have approved a policy waiver to do so. Requests for approval for orientation tours or visits to U.S. military installations and activities must confirm the approval of the SCO Chief, justify the importance of the tour to the country's training effort, and include a proposed itinerary and areas of interest.

SHORT DURATION COURSES

Unless the CCMD and DSCA (BPC/ICB) approve a policy waiver, the minimum duration of training in the United States under the IMET program is four weeks if all or part of the overseas travel is paid by IMET. If an IMET recipient country pays 100 percent of the overseas travel to and from CONUS training, there is no minimum duration requirement. Mandatory international military student in processing and/or English language training are not considered part of the five-week requirement.

HIGH COST TRAINING

With the exception of Invitational Professional Military Education (PME) and postgraduate education, IMET may not fund high-cost training (defined as any training or any single course of training with a tuition cost of \$50,000 or greater). However, DSCA (BPC/ICB) and the CCMD may consider a policy waiver for selected high-cost training on a case-by-case basis. A training course which costs \$50,000 or less when planned, but subsequently exceeds that threshold due to a price increase of not more than 10 percent, does not require a waiver to the high-cost restriction.

HEALTHCARE COVERAGE WHILE IN THE UNITED STATES

All International Military Students (IMS) and authorized dependents are required to have healthcare coverage while in the United States. The IMS are held responsible for payment of all incurred healthcare bills, including co-payments, deductibles, and services not covered by the healthcare coverage.

DISTANCE LEARNING COURSES

The primary purpose of IMET is to bring foreign military students to the United States to participate in courses with U.S. and other international military students. As such, PM/SA does not generally support distance-learning courses. Requests for an exception to this policy must be submitted to PM/SA and DSCA for review prior to scheduling the course.

MOBILE EDUCATION AND TRAINING TEAMS (MET & MTTs)

The IMET program may provide training that requires U.S. personnel to conduct the training in another country when the CCMD and DSCA have approved a policy waiver, or where a waiver exception exists. Training services may be provided in-country on a temporary duty (TDY) basis by a MET or MTT. To include such training under the IMET program, the CCMD and DSCA (BPC/ICB) must approve a waiver prior to programming or making any offer or commitment to the foreign government. MET / MTT requests under the IMET program should clearly demonstrate that the MET / MTT is the best training option and that IMET is the only funding option. MET / MTTs funded under the IMET program should support the train-the-trainer concept.

Exceptions: The following MTTs do not require a policy waiver:

- E-IMET MTTs.
- Defense Language Institute English Language Center (DLIELC) in-country English language surveys without a policy waiver if the objective is to develop recommendations on where and how an in-country English language training program can be developed or improved.

ENGLISH LANGUAGE LABS

PM recognizes the importance of building partner nation English language capacity in our overall security engagement and encourages the use of IMET to build organic English language training capabilities. This approach may decrease the amount of IMET funding needed for prolonged pre-requisite English language training and permits the country to train more students with its IMET allocation. As such, IMET may support the provision of English language labs, as well as books and publications, to support the labs.

IMET funded English language labs may ONLY be used by the military or other IMET-approved personnel. IMET-funded language labs may NOT be used by the general public, police, family members, or other personnel not eligible to participate in IMET training. SCOs are highly encouraged to regularly visit U.S. funded English language labs to ensure compliance with State's legal and policy guidance.

To enforce who may use IMET funded English language labs, the following non-legally binding diplomatic note MUST be delivered to the partner country PRIOR to turning over a new language lab to the host nation. Copies of the diplomatic note MUST be sent to PM/SA.

The Embassy of the United States of America presents its compliments to the Government of (insert country here) and has the honor to refer to earlier discussions between the representatives of the two Governments regarding the furnishing of English language labs and lab support materials in accordance with the International Military Education and Training (IMET) program. In

accordance with these discussions, this diplomatic note sets forth an understanding that IMET funded English language labs and support materials should only be used by the Government's [insert recipient force] and should be used only to train the [insert recipient force], for which the assistance is being provided. The Government of (insert country here) should ensure the security of the assistance provided and the maintenance of English language instructors with the labs and materials provided. The Government of (insert country here) should express in writing to the Embassy of the United States of America a plan to maintain the IMET-trained language instructors for a minimum of two years after training is provided prior to rotating to other jobs.

Dedicated English language instructors are critical to the success of an in-country English language program. SCOs should not request an IMET funded English language lab unless the partner nation is willing to dedicate personnel to the lab, ideally for at least 2-3 years, and to an overall English language program improvement effort. An IMET-funded assessment by the Defense Language Institute (DLI) Lackland and the Army's Communications-Electronics Command (CECOM) must be completed prior to IMET funding a lab. English language instructors must be trained and ready to begin work when a lab is installed to maximize the provision of assistance. Basic and Advanced English language instructor courses may be funded with IMET.

V. IMET PLANNING, BUDGET, AND EXECUTION PROCESSES

PLANNING LIFECYCLE

SCOs submit budget requests for IMET according to the budget process described in section VIII of the FMF GMAG and annual budget guidance.

State Regional Guidance: State promulgates country and region-specific IMET guidance on an annual basis prior to the SCETWG to inform SCO's initial development of their IMET training plan. In addition to highlighting significant global IMET policies, this State guidance outlines legal and policy restrictions for each country, including Congressional notification requirements, and identifies countries that are subject to a heightened requirement for E-IMET participation.

Combined Education and Training Program Plan Development: Prior to each CCMD's SCETWG, the CCMDs task the SCOs with developing and updating a Combined Education and Training Program Plan (CETPP). The CETPPs provide additional context for evaluating a country's IMET plan, and include program objectives, training requirements, and other administrative and reporting elements. The CETPP also includes sections on positions of prominence for IMET graduates that State highly encourages SCOs update annually. In addition, Appendix H of the CETPP (which includes sections on human rights, women in the military, and tracking of graduates) will be reviewed closely at the SCETWG. PM/SA encourages careful review and updating of Appendix H.

Standardized Training List (STL) Development: Based on the State guidance and the CETPP, SCOs consolidate requested training and develop an initial STL with the MILDEP training organizations. The STL is a list of all country's training, by program type and fiscal year, for each MILDEP. See Section VII for additional information.

Security Cooperation Education and Training Working Group (SCETWG): Each CCMD is required to conduct a SCETWG during which country team representatives conduct a detailed review of country-specific IMET plans with State and DSCA policy personnel, MILDEP training organizations, and selected military schoolhouses. At the SCETWG, the working group reviews and finalizes training plans for the current fiscal year, and reviews initial planning for the following fiscal year. State, DSCA, and CCMD policy panel must approve the plan for the current and following fiscal years. After the SCETWG, the training plan may not substantively change without DSCA and State approval (i.e., changes in dates are acceptable without further approval, but the addition or removal of courses will require additional policy review).

Case-by-case Approvals: SCOs may contact PM/SA on a rolling basis wherever PM/SA approvals are required for a specific course or recipient.

FINANCIAL LIFECYCLE

State Approval: Most IMET is one-year money, requiring obligation before the end of the fiscal year in which it was appropriated; however, Congress has been appropriating a limited amount of two-year funding for additional flexibility.

Before releasing funds, the PM Assistant Secretary and the Director of U.S. Foreign Assistance Resources must approve the purpose and allocation of funding for each program. Regional bureaus, the Office of the Legal Adviser, and other stakeholders also have the opportunity to review. Once the action memo is approved within State, State seeks OMB approval to apportion funds to DSCA and then informs DSCA that it may obligate funds for countries not requiring Congressional notification.

Funding Approval: If State is operating under full-year appropriations act or a full-year continuing resolution (CR), State will eventually be able to release the full IMET allocation, instead of in tranches, for each country that is not subject to legal or policy restrictions. However, due to requirements to provide Congress with annual allocations after a full-year appropriations act or a full-year CR is passed, the releases will likely occur in tranches, which impact the ability to fund courses in a timely manner. Typically, all funds are released by late Spring/early Summer.

If State is operating under a CR of a period of less than a year, PM will only be able to release partial allocations, calculated on a pro-rated basis according to the period of the continuing resolution and countries' scheduled course requirements. SCOs should ensure the STL is always up to date so that each MILDEP is funded for courses that occur early in the fiscal year.

Congressional Notification: Annual appropriations legislation requires that State properly justify all IMET prior to obligation. Generally, the Congressional Budget Justification (CBJ) serves as the Administration's justification for IMET funding. State must "specially" notify certain IMET programs (i.e., countries) to Congress, via an additional formal Congressional Notification, in the following circumstances:

- State did not previously justify the funds in the CBJ (e.g., funds for a country not requested in the CBJ or funds requested for a regional program not listed by country);
- State is providing funds more than ten percent above the CBJ level;
- State is providing funds to a country or for an activity for which special notification is required (this list changes annually in the appropriations bill and PM will provide guidance on this point in the SCETWGs).

In these instances, State must notify Congress prior to the obligation of the funds. PM prepares a formal Congressional Notification (CN) that outlines the purpose and allocation of funding for the program. Once a CN goes to Congress, **State must wait a minimum of 15 calendar days** (including weekend days) before releasing the funds, and Congressional committee members or staff may submit inquiries or requests for briefings during that time period. By practice, State generally will not release funds until relevant Congressional committees have affirmatively responded to the notification, even if the 15 day window has expired.

Other Requirements: Funding releases are also affected by the evolving impact of legal restrictions or requirements, such as requirements that State submit a Spend Plan or Certifications to Congress before releasing funds. Throughout the fiscal year, certain countries may come off or go on restrictions (e.g., because a waiver is signed or a restriction is triggered). To comply with such restrictions and requirements, PM may direct DSCA to suspend, pause, or hold funding releases. PM/SA will send an updated restrictions list to the CCMD and DSCA IMET communities as restrictions evolve (approximately once a month).

Funding Release: Once OMB and State have approved a particular funding release, PM/SA notifies DSCA that such IMET funding is available for release. Assuming funds are already apportioned by OMB, DSCA then allocates the funds by country according to the funding release and MILDEPs in the Defense Security Assistance Management System (DSAMS) and then transfers corresponding funding from the IMET Account into the MILDEP accounts to support planned training. The MILDEPs obligate the funds against training lines on the STL for expenditure.

GUIDANCE ON SCHEDULING COURSES

To ensure funding is available for planned courses, State recommends the following framework:

- Non-Notification Countries: Do not schedule courses until late November to allow enough time for funds to be released from either the Continuing Resolution or Full Year Appropriation. (Note: Recent history has shown the Congress typically passes a Continuing Resolution (partial year budget) at the beginning of the fiscal year. This means State may only release a small portion of any one country's IMET allocation.)
- Notification Countries: Do not schedule courses until early December to allow enough time for funds to be notified to Congress and released for obligation. (Note: State is required to notify to Congress, prior to obligating funds, the funds for
- Countries with restrictions that can be waived: Schedule courses in December or January or after July.
- Spend Plan Countries: Once a new appropriation is enacted, any assistance previously released under a CR that has not already been obligated to training lines is suspended from any further obligation; funds already obligated to training lines may proceed with training and expenditure. It will take State 2-3 months following passage of a new appropriation to complete the Spend Plan. Countries should plan accordingly.

VI. IMET FINANCIAL POLICY BACKGROUND AND INFORMATION

END OF YEAR (EOY) IMET POLICY

In the fourth quarter of each Fiscal Year (FY), State and DoD identify current year IMET funding that cannot be executed as originally planned and is available for re-allocation in what is called the EOY IMET process. The annual EOY process re-allocates funding from countries that cannot use their full IMET allocation within the FY to other countries that have identified and validated training requirements starting in the End of Year Period of the FY (October 1 – December 31) and can be obligated by September 30.

In general, countries are expected to cover planned training with their regular IMET bilateral allocation. However, there may be cases where countries will not have enough regular bilateral funding to fully fund confirmed courses ("Priority A" on the STL), unexpected invitational PME, or other unique training opportunities. In such cases, SCOs are encouraged to include these unfunded requirements for consideration for EOY IMET funding by listing these courses as "Priority Bs" on their STLs, assuming the courses start in the fifth quarter and fit the policy criteria mentioned below. "Priority B" courses must be validated by the Military Departments (MILDEP) as possessing available slots, and SCOs must ensure there is a viable candidate that can be Leahy vetted and medically cleared to attend the course as scheduled. State can only consider fifth quarter courses for EOY IMET funding.

CRITERIA FOR EOY IMET FUNDING

State will only consider the following courses as "Priority B" courses for EOY IMET and will consider them in the following priority order:

1. Invitational PME
2. E-IMET
3. Other PME (support as funds are available)

NOTE: State will not consider funding technical or operational training, English language instructor training, or English language labs, books, or publications with EOY IMET funding. Mobile training teams are also not considered executable in the fifth quarter.

EOY IMET PROCESS

1. During the annual SCETWG for each CCMD, countries plan for potential EOY courses (Priority B courses) and these are reviewed by the State/DSCA Policy panel.
2. In June (dates vary slightly year to year), the STLs for each country locks, meaning no further changes may be made to the current FY training plan.
3. After the STLs are locked the CCMDs submit to DSCA their fifth quarter EOY training requirements (training that can be funded by September 30 and starts between October 1 and December 31 of the next fiscal year) in prioritized order to only include EOY applicable courses.
4. During the July EOY financial review, DSCA and the MILDEPs, in consultation with State, identify available funding that cannot be executed by countries for training. Such "EOY" funding then becomes available to support global training requirements.
5. Concurrently, the MILDEPs verify the identified unfunded training requirements (Priority B courses on the STLs that were agreed to and placed on STLs at the SCETWG) occurring in the EOY period of the FY for EOY funding consideration.
6. Upon conclusion of the EOY Review, DSCA will provide State the total EOY funding available as well as a consolidated CCMD's prioritized list of countries and courses to be considered for EOY IMET funding based on EOY criteria.
7. State reviews the submission and based on legal and policy reviews and EOY IMET guidance, makes course funding determinations by priority countries and courses.
8. State then informs DSCA and the CCMDs which courses have been approved for EOY funding. DSCA in turn provides a detailed breakout to the MILDEPs and SCOs.
9. State will draft and clear an allocation memo and Congressional notification to approve and notify the funds for release.
10. DSCA moves EOY funding to the appropriate MILDEPs for release no later than the first week of September.
11. DSCA allocates funds to the MILDEPs upon release. All funds must be obligated before September 30 of the FY.

X-YEAR IMET AUTHORITY AND POLICY

X-Year IMET Authority Background

From FY 1999 to 2011, Congress authorized in the annual appropriations bill up to a certain amount of the annual IMET appropriation to remain available until expended. This authority has allowed State and DSCA to recover unexpended one-year IMET funds in Fiscal Years 2002 through 2011, and repurpose it as what State refers to as X-Year or No-Year IMET funds. Congress did not include this authority in the annual appropriations bill beginning in FY 2012. State retains the authority to expend the residual X-Year IMET funds accumulated between FYs 1999 – 2011 for purposes State determines in accordance with its X-Year policy but does not have the legal authority to add additional funding appropriated in FY 2012 or later fiscal years to the X-Year account.

General Policy for Use of X-Year IMET

State has used X-Year IMET funding to support training requirements that arise from unique and unplanned circumstances in a given fiscal year. As the funding available under State's De-Ob / Re-Ob authority becomes available for global training requirements in FY18 uses of X-Year funding will become more focused.

State will allocate X-Year IMET funding on a case-by-case basis, according to the following policy:

- *Starting or Restarting an IMET Program:* X-Year IMET may be used to start or restart an IMET program for countries where legal or policy restrictions were removed in a given fiscal year.
- *Increasing Female Participation:* X-Year IMET funding may be used to support female participation in IMET courses. X-Year funding approved for female candidates can only be used for female candidates and cannot be substituted with male candidates at a later date. X-Year may be approved for this purpose for:
 - Invitational PME for a female candidate for the following FY.
 - Training targeted to support the increased participation of women in the IMET program through any IMET courses as long as the course will benefit the female candidate in her career path and is consistent with U.S. IMET policy objectives in the country.

Other X-Year Requirements

- To be considered for X-Year funding, countries should not be restricted by law or policy in the current appropriations year (e.g. X-Year will not be used to get around current restrictions). PM will not provide X-Year funding to a country that was legally prohibited from receiving IMET in the year the funds were originally appropriated.
- X-Year IMET funds must be spent only for the purposes that State has approved and notified to Congress.
- Countries with prior year X-Year funding that has not been obligated against training by the time of the annual X-Year Solicitation (generally the Spring), will not be included in the prioritization for receipt of new X-Year funding, unless there are mitigating circumstances that State will consider on a case by case basis.
- X-Year IMET generally will not fund technical training unless it is for a female participant and consistent with IMET and general security assistance objectives in the country.

- X-Year will not fund training already covered in the country's annual bilateral IMET allocation, unless it is for female candidates to attend invitational PME courses.
- X-Year funding must be requested for training planned for the current or upcoming fiscal year.
- Funding must be obligated as soon as practicable and planned for courses starting expenditure within twelve months from when the funds are released.

Process for X-Year IMET Planning & Release

1. State will provide annual X-Year year guidance to the training community prior to the annual SCETWGs.
2. Prior to and during the SCETWG, SCOs will identify courses that meet the above listed X-Year requirements and work with the MILDEPs to program the identified courses into a dummy Standardized Training List (STL) titled "15X." This will allow State, SCOs, CCMD, and the MILDEPs to validate that 1) accurate pricing is provided to State for consideration of funding and 2) to ensure that the courses are available and can actually be programmed.
3. State will review the global requirements for X-year and determine the amount of funding that will be made available after conducting a prioritized review.
4. State will draft and clear a Congressional notification and inform DSCA once funds are available for release and expenditure. In parallel, State will inform DSCA and the CCMDs (who will then provide a detailed breakout to the MILDEPs and SCOs) what courses for which countries will be funded with what fiscal year X-year. MILDEPs will then be requested to move all courses funded from the dummy STL 15X to the correct STL (e.g. 11X or 10X).
5. After the expiration of the Congressional notification of the funds, State will send a cable to all recipient posts explaining how much each country is receiving and for what approved purposes. For countries who are receiving X-Year funding for female participation, the cable will clarify what processes need to be followed if a female candidate ends up not being able to participate in the planned course.
6. Funds should be obligated on training lines as soon as possible and training must start within twelve months of the release of funds. If training does not begin within that timeframe, State may consider reprogramming the funds to another country recipient.

TWO-YEAR IMET AUTHORITY AND PROCESS

In each annual appropriations act beginning in FY 2012, Congress authorized that a specified amount of that fiscal year's IMET funds may be made available for two fiscal years ("two-year" funds). There is no policy distinction between the use of two-year IMET funds and regular one-year funds. The only difference is that the funds are available for an extra fiscal year to obligate. State traditionally only uses the two-year IMET funds for countries that are subject to complicated legal restrictions that may not be met early enough in the fiscal year to obligate them by September 30 of the year of appropriation. For example, Egypt has received two-year IMET funds for several years due to the legal certifications/waivers required that are often completed in late spring/early summer. As tracking the two-year funds complicates the process with DSCA, the MILDEPs, and SCOs, State only utilizes the two-year authority on an exceptional basis. Two-year funds are programmed on a separate STL as regular one-year IMET funds. The two-year funds are on a "Q" STL (e.g. FY 2019 two-year funds are on the 19Q STL).

DE-OBLIGATION AND RE-OBLIGATION AUTHORITY

State's annual appropriation bill provides the legal authority to de-obligate and re-obligate IMET funding for four years after the original period of availability (e.g., to de-obligate FY 2016 IMET funds in FY 2020 to another country for use). The de-obligated funds must then be re-obligated before September 30 of that fourth year (i.e. for single-year FY 2017 IMET funds, they would need to be re-obligated by September 30, 2021). Once funds are re-obligated, those funds remain available for expenditure up to five years following the four-year de-ob/re-ob period (e.g. FY 2017 IMET funds de-obligated and re-obligated in FY 2021 remain available for expenditure until the end of FY 2025). Once funds pass the five-year expenditure period, those funds are cancelled and are no longer available for expenditure. As such, they must be returned to the U.S. Treasury. Unlike X-Year or No-Year IMET, there is no cap on how much IMET funding can be de-obligated every year.

For two-year IMET funds that were obligated during the original period of availability, the four-year period for re-obligation begins at the end of the second year of availability. For example, FY 2014 two-year IMET funds (16Q) that are obligated before the end of FY 2016 remain available for re-obligation through September 30, 2021 since they were originally available for obligation until September 30, 2016. The same process applies to two-year IMET funds in subsequent fiscal years.

Policy for De-ob / Re-ob IMET

State intends to use the De-ob / Re-ob IMET funding to support training requirements that are not covered by the county's normal bilateral IMET allocation to address training opportunities in a given fiscal year. Therefore, De-ob / Re-ob IMET is intended to be a strategic tool with flexibly and responsively react to global changes and support U.S. security interests' through the provision of timely training assistance.

To be considered for De-ob / Re-ob funding, a country should not be restricted from receiving IMET by law or policy in the current appropriations year or in the year the funds were originally appropriated. De-ob / Re-ob will not be used to circumvent current restrictions.

De-ob / Re-ob IMET funds must be expended only for the purposes which State has approved and notified to Congress.

State will allocate De-ob / Re-ob IMET, according to the following priorities and in line with overall global IMET priorities:

- Invitational PME, Expanded-IMET, Other PME, English Language Instructor Training and *English Language Lab Development (to include English Language labs)*;
- Operational or Technical Training
- Books and publications for English language labs.

De-Obligation and Re-Obligation of IMET in Practice

During the First Quarter of the fiscal year, DSCA will work with the MMILDEPs to scrub IMET funds available for de-obligation and re-obligation (going back four years from the current fiscal year, e.g., in FY 2021, FY 2017 IMET funds will be de-obligated). State requests that DoD provide the amount of funds available for de-obligation no later than February 1, 2021. The process to allocate funds available for de-obligation/re-obligation should be similar to the annual EOY IMET process.

Process for De-ob / Re-ob IMET Planning & Release

1. The MILDEPs will identify and provide the total (lump sum) of de-obligated funds by appropriation to DSCA by the end of the first quarter of the current fiscal year.
2. The MILDEP will forward the information through DSCA, who will report to State PM for reprogramming according to State's policy guidance.
3. State will issue updated guidance on de-obligation and re-obligation of IMET prior to each annual SCETWG cycle as an inclusion to the IMET GMAG. This guidance will also include any legal restrictions on countries for that particular. (e.g., In FY17, Bandaria was restricted by the State appropriations bill to E-IMET courses. Therefore, Bandaria may only submit for E-IMET courses under 17R.)
4. Prior to and during the SCETWG, SCOs will identify courses and work with the MILDEPs to program them into a dummy Standardized Training List (STL) titled "17R" that meet the De-ob / Re-ob policy above for the following FY training requirements. This will allow State, SCOs, CCMD, and the MILDEPs to ensure that there are slots available and to have accurate pricing for each country's De-ob / Re-ob request.
5. State will prioritize the global requirements for De-ob / Re-ob and determine which courses to fund depending on how much funding is available (which could vary significantly year to year).
6. State will inform DSCA and the CCMDs (who will then inform MILDEPs and SCOs) what courses for which countries will be funded with the de-ob/re-ob IMET funds.
7. State will draft and clear a Congressional notification and inform DSCA once funds are available for release and re-obligation. State will include the de-obligated funds in a single wrap up memo in the spring/summer based on valid requirements that can be obligated by the end of that fiscal year. This will depend on when the funds are available.
8. Funds de-obligated from FY 2017 must be re-obligated NLT September 30, 2021.
9. Course should start no later than December 31 after the funds are obligated. However, unlike IMET EOY, PM anticipates being able to release the de-ob/re-ob funds earlier in the fiscal year. Therefore, classes can be planned for as early as possible of the following year through March 31

of the following year. (For example, 17R courses planned at the FY 2020 SCETWG may start between April 1 and March (potentially July 31, 2021.)

10. State will notify DSCA when funds are available for release and re-obligation.

VII. LEAHY VETTING AND IMET

IMET is subject to the Leahy Law in section 620M of the FAA. Under the Leahy Law, no assistance shall be furnished to any unit of the security forces of a foreign country if there is credible information that such unit has committed a gross violation of human rights. All IMET participants and their units must be vetted in accordance with State Leahy vetting guidance.

VIII. PARTICIPATION OF WOMEN IN THE IMET PROGRAM

The National Action Plan on Women, Peace, and Security, contains five guiding principles, including that the engagement and protection of women as agents of peace and stability will be central to U.S. efforts to promote security; prevent, respond to, and resolve conflict; and rebuild societies. As such, it is State policy to increase the participation of qualified women in the IMET program.

In countries where women are members of the armed forces and/or ministry of defense, SCOs should include qualified women in the IMET program in at least the same percentage as they are present in the defense establishment, accounting for the proportion of their representation in different levels of seniority and areas of expertise. This may require adjusting training plans to include courses for which women from the recipient country are eligible to attend. However, the courses should still advance the overall U.S. government security assistance and IMET goals for each country. The ability to use X-Year IMET to increase women's participation in IMET is additive and does not supersede the goal of increasing women participation in the base IMET allocation.

IX. IMET MONITORING AND EVALUATION

IMET is intended to build lasting relationships with members of a partner's defense establishment. As such, SCOs should make every effort to track the progression of IMET graduates throughout their military careers. While State recognizes limitations on SCOs' ability to do so comprehensively, State strongly recommends that, at a minimum, mid-level and senior-level PME graduates should be followed-up with upon returning from training. This information should be included in Appendix D of the annual CETPP submitted to the CCMDs.

In 2020, for the second time, State sent a cable to posts' Political Sections at Posts requesting feedback on the impact of the Foreign Military Financing and IMET programs. State received a significant amount of feedback on IMET and will carry this practice forward as an annual reporting requirement, typically in the October timeframe, for posts. State will rely upon the SCOs to provide the Political sections' feedback on the benefits and challenges of the IMET program, including specific examples, and areas where we can leverage the program to advance our security objectives around the globe. While the primary focus of IMET evaluation efforts is on understanding the impact and return on investment of the program, the M&E team also is interested in best practices and challenges in administering the program. PM/SA team intends to capture this information during the SCETWGs but and training managers share any insights with the M&E team at any time (PM-SA-M_E-Team@state.gov).

X. IMET ALUMNI ENGAGEMENT

State, through the IMET program, has funded training for a significant number of senior level military and civilian personnel at senior and intermediate DoD schoolhouses. While some of these alumni interact with Post officials, via the Political Section or SCOs, State does not have a systematic way to engage with alumni to further our security interests in a particular country. In countries where the military plays a large role in security efforts regionally and internationally, State intends to leverage these alumni,

determine their current roles, and better understand the impact their U.S. IMET education has had in their careers as agents of change. To that end, State and DoD have established a process to review and approve IMET funding for several “Alumni Seminar” courses that will be hosted annually by the Invitational PME schoolhouses (e.g., Army War College, Air War College, and National Defense University). These institutions will hold seminars either regionally or at their academic institution. SCOs should keep this in mind and identify graduates who should attend these seminar once they are advertised.

XI. IMET SUSTAINABILITY: PARTNER COUNTRY COST SHARING

In addition to course costs, the U.S. government invests a considerable amount of IMET funds on travel and living allowances for many of the IMET participants. SCOs should consult with the partner country regarding cost sharing arrangements on transportation and living allowances, to defray some of those expenses. In particular, countries considered high income by the World Bank are strongly encouraged to pay for student travel and living costs. In the case of countries designated as high income, SCOs are required to submit information on the efforts, if any, that the partner nation has made to pay for the travel and living expenses that have historically been covered by IMET. For the high income countries listed that are not contributing part of the Travel and Living Allowances, the Administration may decrease or zero out allocation of funding in the future. (Note: High income countries are based on the World Bank’s Wealthy Country List, which can be found at <https://data.worldbank.org/income-level/high-income>.) IMET funds would then be focused strictly on tuition costs, which would increase the number of students that a country could send. Cost sharing agreements are set between a country and the MILDEPs, and countries may reach different agreements for different courses.